

**In the United States District Court  
For the Southern District of Texas  
Houston Division**

**Travelers Casualty and  
Surety Company of America,**  
Plaintiff,

v.

**PRCHOU, LLC, Mukadas D.  
Kurban, Apar Pataer, Abdul R.  
Dawood, and Maria E. Dawood**  
Defendants.

**Case No. 4:24-cv-00796**

**Unopposed Motion for Enlargement of Time**

Defendants file this Unopposed Motion for Enlargement of Time to request a one-week extension of the deadline for Defendants to file their answers to Plaintiff's amended complaint.

This Motion is being sought as a result of Hurricane Beryl. Defendants and their counsel remain without power and have only limited internet access. The one-week extension would provide the time needed for the parties to prepare and file appropriate answers to the amended complaint. The proposed new deadline is July 19, 2024.

Counsel for Plaintiff, Brandon Baines, stated that Plaintiff is unopposed to this Motion and the relief requested herein.

For the reason stated above, Defendants respectfully request that the Court extend Defendants deadline to answer Plaintiff's amended complaint to July 19, 2024. Defendants also request all other relief to which they are justly entitled.

Respectfully Submitted,

**Meade Neese & Barr LLP**

/s/ D. John Neese, Jr.

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**Attorneys Defendants  
PRCHOU, LLC,  
Mukadas D. Kurban, and  
Apar Pataer**

### **Certificate of Conference**

Counsel for Plaintiff indicated that he is unopposed to the relief requested herein - specifically, a one-week extension of Defendants' answer deadline to July 19, 2024.

/s/ D. John Neese, Jr.  
D. John Neese, Jr.

### **Certificate of Service**

I hereby certify that a true and correct copy of the foregoing document was served on all counsel of record by electronic service on July 12, 2024.

/s/ D. John Neese, Jr.  
D. John Neese, Jr.